

IN THE UNITED STATES DISTRICT COURT OF  
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL  
SMITH,

Plaintiffs,

VS.

CSAA FIRE & CASUALTY  
INSURANCE COMPANY,

Defendant.

Case No. 5:17-cv-1302D



DEPOSITION OF CHAD WHITE HECKMAN  
TAKEN ON BEHALF OF THE PLAINTIFF  
IN OKLAHOMA CITY, OKLAHOMA  
ON OCTOBER 23, 2018

REPORTED BY: SUSAN J. FENIMORE, CSR, RPR



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1 A Yes.

2 Q Do you have a personnel file at the  
3 company?

4 A Can you elaborate on that?

5 Q Sure. How often are they auditing your  
6 performance, once a year or twice a year?

7 A Every month they are taking a few files and  
8 reviewing them.

9 Q Oh, that's the auditing claims. I mean, do  
10 they ever sit down and discuss with you your  
11 performance metrics or talk to you about, you know,  
12 this and this happened this year, next year we want  
13 you to focus on this or career planning kind of  
14 stuff? You know, like once a year they'll do like a  
15 sit-down and talk with you in your boss' office, like  
16 a performance review, if you will. Do you understand  
17 what I'm asking?

18 A I do understand and they do a -- there is a  
19 yearly review where they go over your plan and how  
20 you're doing. But then throughout the year, there  
21 are one-on-one meetings that I have with my  
22 supervisor to tell me how I'm doing, what I can, you  
23 know, improve on, as well.

24 Q And those -- do they give you evaluations  
25 or anything like that in writing?

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1           A     They give you like reports as far as how --  
2     that's where the internal reviewing of your claims.  
3     If they take some files, they can give you feedback  
4     on those and give you essentially the report on how  
5     you did. And that's kind of how you're getting your  
6     feedback.

7           Q     Have you ever received an OID complaint on  
8     one of your claims?

9           A     You mean the Oklahoma Insurance Department?

10          Q     Yes, sir.

11          A     Yes.

12          Q     How many?

13          A     I do not know.

14          Q     More than two?

15          A     Yes.

16          Q     Are any of these related to earthquakes?

17          A     Not that I'm aware of.

18          Q     Are any of them related to engineers?

19          A     Not that I'm aware of.

20          Q     If you had OID complaints, who sends the  
21     response?

22          A     My supervisor.

23          Q     Who's your supervisor?

24          A     As of right now, it is Robin Burch.

25          Q     Oh, right, I'm sorry, you already told me

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1 policy and you said you could determine it based on  
2 the dec page?

3 A Yes.

4 MR. ANDREWS: That's this second page from  
5 Exhibit 12.

6 MR. ENGEL: Thanks.

7 THE WITNESS: So they have the specified  
8 additional insurance coverage A, extended replacement  
9 cost coverage on that. And they don't have an  
10 exclusion either on here for certain coverages where  
11 it's actual cash value only. You can have  
12 endorsements that make it an actual cash value only.

13 Q (By Mr. Engel) Okay. So to you, this is a  
14 replacement cost policy, right?

15 A They have -- yes, they can have the  
16 replacement cost value.

17 Q So the market value, when you're writing an  
18 estimate for this home, the market value would never  
19 be a factor?

20 A For repairs, no, because we're not going to  
21 look at the market value of the house, we're going to  
22 look at the damages and what's it going to cost to  
23 make those repairs.

24 Q Right. And I understand it's your position  
25 that none of these are covered, right?